No. 98596-1

IN THE WASHINGTON SUPREME COURT

IN RE THE DEPENDENCY OF E.M.,

STATE OF WASHINGTON,
Respondent,

v.

J.M.,
Petitioner.

AMICUS BRIEF OF THE KING COUNTY DEPARTMENT OF PUBLIC DEFENSE

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I. INTRODUCTION

The issue presented by this case is not whether dependent children have important rights that require protection—they absolutely do. The issue is whether these rights are necessarily protected by allowing privately retained counsel to appear in a dependency case on behalf of a child too young to inform the attorney of their interests and too young to direct the litigation.

The statute, RCW 13.34.100(7), offers protection to very young children who are not developmentally mature enough to be able to direct attorneys retained on their behalf, and the court of appeals correctly held that the statute requires courts to exercise a gatekeeping role and determine whether very young children should have their own attorney in a dependency case. For such children protection is necessary because the appointment of counsel gives lawyers wide discretion to make important decisions, including decisions regarding advocacy about where the child will live and who they will have the chance to visit, without reliable input from, and often without meaningful consent of, the child.

Because lawyers are not free of bias, the Court should not assume that legal representation for children who are too young to express their interests, provide input, or direct the litigation, necessarily advances a child's rights.

II. ISSUES PRESENTED FOR REVIEW

1. Are children's rights best protected by allowing courts to exercise a gatekeeping role prior to determining whether young children should be represented by counsel?

2. Did the trial court correctly require a privately retained attorney wishing to appear on behalf of a dependent child to first move the court for permission, as required by statute?

III. STATEMENT OF THE CASE

For the purpose of the amicus brief, counsel relies on the facts as articulated by the Court of Appeals. *Matter of Dependency of E.M.*, 12 Wn. App. 2d 510, 458 P.3d 810, *review granted*, 196 Wn.2d 1009, 473 P.3d 256 (2020).

IV. STATEMENT OF INTERESTS

In King County, the Department of Public Defense (hereinafter "DPD") assigns attorneys to both parents and children in dependency cases. For children, we assign cases in three situations: 1) pursuant to King County LJuCR 2.3 and 2.4 when a new case is filed involving a child who is 12 years of age or older, 2) when directed to assign counsel by the court because a dependent child has turned 12 during an ongoing dependency case, and 3) when directed to assign counsel by the court because the court has determined that procedural due process requires appointment of counsel.

In order to provide high-quality representation to dependent children in King County, DPD employs and trains attorneys in its four divisions. When the divisions have a conflict, DPD maintains a panel of privately contracted attorneys to provide representation to children. The cost of providing attorneys for children in King County is borne almost entirely by the County General Fund. Our office does not currently have a process that allows for someone other than the court to direct that counsel be assigned to a child.

V. ARGUMENT

This brief discusses risks created when an attorney is permitted to identify the goals of litigation on behalf of a child in a dependency case. Understanding these risks provides important context to the underlying question raised here about whether courts must act as gatekeepers in instances where privately retained counsel seek to appear in a dependency case on behalf of a child too young to inform the attorney of their interests and too young to direct the litigation.

The present case arises against a backdrop debate about the role of an attorney for a young child in a dependency case. Here, the attorney filed a motion to reconsider E.M.'s change in placement, and sought placement with his grandmother, without meeting E.M. and without seeking E.M.'s consent to the representation, because "the right to family integrity is a legal

right" and the lawyer "believed that E.M. was more likely than not to suffer harm unless an action to reconsider placement in foster care was taken." *See Matter of Dependency of E.M.*, 12 Wn. App. 2d at 514.[1] The mother argues that E.M. would have benefited from an advocate for him in the courtroom. (Pet. Sup. Br. at 10).

This brief aims to point out how permitting an attorney to determine the goals of the litigation on behalf of the child, without the child's consent or participation, inserts the attorney's subjective views, and biases, into the litigation. The facts of this case demonstrate how, when a child cannot themselves direct the litigation, attorneys can introduce a troubling level of arbitrariness that risks misrepresenting the interests of dependent children.

A. This Case Arises Amid an Ongoing Debate About the Appropriate Role of Lawyers for Very Young Children in Dependency Cases

There are some children who, because they are so young, cannot provide direction to an attorney. In those situations, when appointed, an

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[1] The attorney sought to do two things: protect the child's legal right to family integrity and protect the child from harm as provided for in RPC 1.14. It will be up to this Court to determine whether the attorney in this case correctly exercised the protective action authorized by RPC 1.14. RPC 1.14 permits a lawyer to take protective action on behalf of a client with diminished capacity. *Id.* In this case, the lawyer sought to avert harm to the child that the attorney believed arose out of a decision made by the dependency court. The attorney's concern does not appear to be based on information about E.M. that was uniquely available to the lawyer. The protective action the lawyer took went beyond "consulting with individuals" or "seeking the appointment of a guardian ad litem," as provided in the rule, but instead, sought alternate relief in court.

attorney must fill in the gap; yet there is significant debate and uncertainty about the role of attorneys in dependency cases when the child is too young or unable to provide direction.

When children *can* direct the litigation, there is agreement that lawyers for children should represent the stated interests of a child client. *See* Lisa Kelly & Alicia LeVezu, *Until the Client Speaks: Reviving the Legal-Interest Model for Preverbal Children*, 50 Fam. L.Q. 383, 390 (2016) (hereafter "*Until the Client Speaks*"). But when the child cannot state a position in the litigation some states have allowed attorneys to substitute their own judgment on behalf of the child and others have proposed limiting the representation only to a child's "legal interests." *Id.*

The first model, a substituted judgment model, asks the attorney to place themselves in the shoes of the client and direct litigation as they imagine the child would want. Scholars have identified significant concerns with this approach.

> The substituted-judgment model continues to allow the individual attorney to control the direction of the representation, which allows for the domination of implicit biases, inconsistent advocacy, and a lack of transparency. The model also continues to assume nonexistent expertise because the attorney is to discern what a preverbal client would want, acting as a form of "baby whisperer" to decipher the preverbal client's direction. The substituted-judgment model continues to wrest power from parents, who would normally be expected to interpret what their nonverbal children want, and to place that power in the

> hands of third-party strangers. Finally, like best-interest representation, there is no provision in the ABA Model Rules of Professional Conduct that allows for substituted-judgment representation.

Until the Client Speaks, at 392; *see also* Martin Guggenheim, *The Right to Be Represented but Not Heard: Reflections on Legal Representation for Children*, 59 N.Y.U.L. Rev. 76, 77 (1984); Annette Ruth Appell, *Representing Children Representing What?: Critical Reflections on Lawyering for Children*, 39 Colum. Hum. Rts. L. Rev. 573, 599 (2008).

Research has likewise demonstrated problems with a substituted judgement model. One study of lawyers for young children in Florida noted that the lawyers aggressively pursued the termination of parental rights.[2] One social service provider in the study said: "Social work is about believing that people can change. But it doesn't seem like [the lawyers for children] really believe that people can change." *Id.* Another study from Nebraska found that when allowed to exercise their own judgment to direct the course of the litigation on behalf of children, lawyers acted as a "rubber stamp" for the state.[3] A study from Texas found that attorneys for children

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[2] A. E. Zinn & J. Slowriver, *Expediting Permanency: Legal Representation for Foster Children in Palm Beach County*. Chapin Hall Center for Children at the University of Chicago (2008), available at: https://www.issuelab.org/resources/1070/1070.pdf

[3] Erik S. Pitchal, et al., *Evaluation of the Guardian Ad Litem System in Nebraska*, National Association of Counsel for Children (December 2009), available at: https://www.naccchildlaw.org/news/35016/NACC-Study---Evaluation-of-the-Guardian-Ad-Litem-System-in-Nebraska

often failed to meet with their clients but continued to appear in court and support the child's current placement.[4] Similarly, research into the appointment of Court Appointed Special Advocates shows that non-lawyer professionals who are allowed to rely on their own judgment to direct the litigation on behalf of children actually increase rates of termination and yield worse outcomes for dependent children.[5]

In response to these concerns about a substituted judgment model, scholars have identified an alternative: the "legal interests" model. Yet, there is additional disagreement about what a "legal interests" approach entails.

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[4] Supreme Court of Texas, Permanent Judicial Commission For Children, Youth and Families, *Legal Representation Study: Assessment of Appointed Representation in Texas Child-Protection Proceedings*, January 2011, pg. 41-46, available at: http://texaschildrenscommission.gov/media/1401/012111meetingreports.pdf.

[5] *E.g.* Cynthia Osborne, *et al.*, *The Effect of CASA on Child Welfare Permanency Outcomes*, 25.3 CHILD MALTREATMENT, 328-338 (2020) (finding that "compared to children without a CASA, children who have been appointed a CASA volunteer are less likely to reach any type of permanency as a final case outcome… children with CASA volunteers have lower odds of being reunified with their families of origin, higher odds of being adopted, and lower odds of being placed in permanent kin guardianship than children without a CASA"); U.S. Dep't Of Justice, Office Of The Inspector Gen., Audit Report 07-04, National Court Appointed Special Advocate Program 19 (2006), (finding that children in CASA assigned cases were "more likely to be adopted and less likely to be reunified with their parents") available at: https://oig.justice.gov/reports/OJP/a0704/final.pdf.

One view of "legal interests" representation was identified in practice standards approved by the ABA in 1996.[6] This approach gives the attorney wide discretion to direct the litigation, noting that the "child's various needs and interests may be in conflict and must be weighed against each other." *Id.* Even scholars who favor a "legal interests" model recognize that this rule, asking attorneys to independently balance competing interests, is not meaningfully different from a substituted-judgment model. *Until the Client Speaks,* at 394.

In response scholars have proposed an alternate "legal interests" model, which further limits the attorneys role: "A legal-interest attorney would be charged, not with telling the court what the advocate thinks is best or what the advocate imagines the child would want, but with identifying the legal rights that are implicated in a given situation and advocating solely for the protection of those legal rights." *Until the Client Speaks,* at 396. "Under this model, legal-interest attorneys do not have the authority to assert their will, and their power is constrained to those specific rights

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[6] American Bar Association, *Standards Of Practice For Lawyers Who Represent Children In Abuse And Neglect Cases*, Approved by the American Bar Association House of Delegates, February 5, 1996, at B5 (hereafter "ABA Standards"), available at: https://www.americanbar.org/content/dam/aba/administrative/child_law/repstandwhole.pdf

enumerated in statute or clearly delineated in case law." *The Legal-Interest Model for Preverbal Child Clients*, GPSolo 72 (2018).

In Washington, the Statewide Children's Representation Workgroup suggested an approach somewhat closer to the 1996 ABA practice standards, discussed above, recommending that a lawyer for the child assess various goals a child may have. The Workgroup's report recommends that:

> [I]f the child is pre-verbal or unable to communicate a stated interest, the determination of the child's legal interests should be based on the laws that are related to the purposes of the proceedings, the child's specific needs and preferences, the goal of expeditious resolution of the case so the child can remain or return home or be placed in a safe, nurturing, and permanent environment, and the use of the least restrictive or detrimental alternatives available.

Meaningful Legal Representation for Children and Youth in Washington's Child Welfare System: Standards of Practice, Voluntary Training, and Caseload Limits in Response to HB 2735, Statewide Children's Representation Workgroup, at pg. 6. Commentary to this recommendation recognized disagreement even within the Workgroup on this point.[7] *Id.*

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[7] At least one other national group has expressly rejected the "legal interests" approach in favor of a substituted judgment approach. *See e.g. NACC Revised ABA Standards for Child Representation*, comments to B-4 and B-5, available at: https://cdn.ymaws.com/www.naccchildlaw.org/resource/resmgr/Standards/ABA_Standards_NACC_Revised.pdf. And in 2011 the ABA published a Model Act which provided for a substituted judgment model rather than a legal interests model. *Until the Client Speaks*, at 394-95.

This case arises against the backdrop of this debate about how attorneys for very young children should determine what to advocate for.

B. The Law Recognizes that Children of Different Ages Have Different Abilities to Direct an Attorney

The RPCs and the dependency statute recognize that children have different needs and abilities based on their age.

According to RPC 1.14, the age of a child influences the extent to which the court should rely on the child's opinion concerning their custody. RPC 1.14, Comment 1. First, children over the age of 10 or 12 are "certainly" regarded as having opinions that are entitled to weight in legal proceedings concerning their custody. *Id.* Second, children younger than 10 and older than 5 or 6, are regarded as having opinions entitled to weight, though it is not "certain." *Id.* By inference, children under the age of 5 are not regarded as having opinions entitled to weight.

Similarly, the dependency statute contains a presumption that children 12 or more years of age are entitled to legal representation. Children who are 12 and over are entitled to be served with a dependency petition. RCW 13.34.070(1). Children 12 and over are entitled to notification of a right to request an attorney. *Id.*; RCW 13.34.100(7)(c); RCW 13.34.105(1)(g). And children 12 and over have the right to petition to reinstate their parent's rights. RCW 13.34.215(1)(e). In King County,

local court rules go beyond the statute and require the appointment of attorneys for children over the age of 12 in dependency cases. King County LJuCR 2.3, 2.4.

But for younger children, those under age 12, there is no similar statutory presumption that they should be treated as full parties to the dependency case. Rather, this Court has required lower courts to consider whether counsel is required on a case-by-case basis. *See Matter of Dependency of E.H.*, 191 Wn.2d 872, 893, 427 P.3d 587, 596 (2018). This Court's jurisprudence, which has only addressed cases involving children under the age of 12, recognizes that due process requires the appointment of counsel for some children but not others. *Id.*

C. When a Dependent Child Cannot Direct an Attorney, and the Lawyer Determines the Goals of the Litigation, Their Advocacy Introduces the Attorney's Subjective Views and Personal Bias into the Litigation

When a child is too young to direct an attorney, the attorney must rely on some other means to determine the goals of the litigation. A "legal interests" approach is intended to limit the discretion that lawyers have to direct the goals of the litigation. Yet, even in its most conservative form, a legal interests analysis relies on a lawyer's personal judgment and can therefore add to the arbitrariness and subjectivity which are already found within the dependency court process.

A "legal interests" approach assumes that the law will point clearly one direction and an attorney will be able to take meaningful direction from the law itself. But as the 1996 ABA standards recognize, a child in a dependency case nearly always has multiple, conflicting legal interests.[8] In fact, every dependency matter involves both a child's right to basic safety and the child's right to know and be connected to their family of origin. *In re Dependency of MSR*, 174 Wn.2d 1, 20, 271 P.3d 234, 244 (2012), *as corrected* (May 8, 2012).

This case provides a telling example. Although it is certainly true that E.M. has a fundamental right to family integrity and the law requires a preference for placement with relatives, at the same time E.M. also had a legal interest in reasonable safety. *Braam v. State*, 150 Wn.2d 689, 699, 81 P.3d 851 (2003) (holding that foster children have a substantive due process right to be free from unreasonable risks of harm, including mental harm, and a right to reasonable safety). It is unclear how an attorney could decide

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[8] *See* ABA Standards at B-5 ("A lawyer who is required to determine the child's interests is functioning in a nontraditional role by determining the position to be advocated independently of the client…The child's various needs and interests may be in conflict and must be weighed against each other."). On the other hand, the legal interests model proposed by Prof. Kelly would be "self-conscious in its restraint." *Until the Client Speaks*, at 412. According to that view, when faced with competing legal rights, the lawyer should present both sets of competing legal rights rather than choosing one over the other. *Id.* at 408. It is not clear if the lawyer in this case attempted to follow that model. But regardless, that approach relies on lawyers, trained as advocates, to hold back on taking a position in court. And such a method is not, ultimately, required by any rule.

which of E.M.'s legal interests to advocate for without making her own judgment about the facts of the case. Determining which of a child's "legal interests" to pursue necessarily involves weighing the facts of a case and forming an opinion about the correct course of action. Allowing a lawyer's subjective assessment to determine the goals of the litigation on behalf of a dependent child introduces a lawyer's personal biases into the case, just as in a substituted judgment model. Depending on the lawyer assigned, that view will sometimes favor placement with family, as it did here, but will sometimes favor stranger foster care and the termination of parental rights.

Lawyers are not immune from bias or implicit bias. *See Letter to Members of the Judiciary and the Legal Community*, Washington State Supreme Court (June 4, 2020). And the more discretion afforded by a system the more likely that bias will enter.[9] The legal profession remains disproportionately white and disproportionately of privilege; dependent children are disproportionately Black and Indigenous and come, almost exclusively, from families living in poverty.[10] Lawyers' voices and decisions are not a substitute for those of impacted children.

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[9] Vivek Sankaran, *With Child Welfare, Racism Is Hiding In The Discretion*, June 2020, THE IMPRINT, available at: https://Imprintnews.Org/Child-Welfare-2/With-Child-Welfare-Racism-Is-Hiding-In-The-Discretion/44616

[10] *See* 2019 Washington State Child Welfare Racial Disparity Indices Report *at*: https://www.dcyf.wa.gov/sites/default/files/pdf/reports/CWRacialDisparityIndices2019.pdf.

Further, a "legal interests" approach assumes that a child wants what is in their legal interest. But as public defenders we know that is not always the case: dependent children may not want what the law thinks they should want. Therefore, this approach substitutes the view of the system for the views of the child and sidelines the most important role of an attorney, to advance the client's stated goals. *See* RPC 1.2, Comment 1 (recognizing that the rule "confers upon the client the ultimate authority to determine the purposes to be served by legal representation").

Ultimately, even though "legal interests" advocacy may appear neutral, the facts of this case demonstrate how, in practice, even a determination of a child's legal interests is subjective and can inject bias and arbitrariness into a dependency case.

D. Lawyers' Limited Ability to Accurately Elicit Information from Young Children also Creates Risk that the Appointment of Counsel for a Young Child Will Introduce Error into the Litigation

Lawyers attempting to faithfully represent a very young child's position will also face limitations on their ability to accurately elicit and comprehend what the client is saying, creating further risk that the child's attorney will incorrectly identify the goals of the litigation. It is challenging for adults to communicate with very young children well enough to clearly identify a child's position without influencing what the child will say. *See*

e.g. Matter of Dependency of A.E.P., 135 Wn.2d 208, 231, 956 P.2d 297, 308 (1998). Even when children have information to share, it is dangerous to assume that children can easily make themselves understood by adults, particularly unfamiliar adults, or that adults can easily determine a young child's views. One expert on child interviewing and suggestibility recounts a conversation between a mother and her four-year-old child that captures the concern:

> Mother: So tell me about his crayon.
>
> Child: It's a special crayon.
>
> Mother: Ya.
>
> Child: And sparks.
>
> Mother: What do you mean sparks?
>
> Child: Sparks come out of the crayon.
>
> Mother: When you draw, you mean?
>
> Child: Yes.
>
> Mother: Oh, wow. You mean like fire sparks?
>
> Child: Ya sparks.

The researcher writes, "[t]he child, who was a subject in one of our experiments, was trying to tell his mother about a crayon that has 'sparkles.' Having never seen that type of crayon before, the mother inaccurately concluded that the crayon burns a hole in the paper." Steven Ceci & Maggie

Bruck, Jeopardy In The Courtroom: A Scientific Analysis Of Children's Testimony 77-78 (1995).

In addition, it is unclear which facts an attorney would or could share with a young child when seeking to develop the child's position. A lawyer, acting as a counselor for a young child would be forced to decide whether to share information the attorney learned about the case. This case demonstrates how such considerations can be incredibly fraught. It may not be developmentally appropriate for an attorney in this case to review the discovery with E.M. because it involves questions surrounding the disappearance of an older half-sibling. *See Matter of Dependency of E.M.*, 12 Wn. App. 2d at 512.

Finally, once a young child's stated interest becomes a factor in the litigation it increases the likelihood of coaching from all parties and caregivers. As a result, a dependency court could reasonably determine that for very young children, the dangers of placing additional emphasis on the child's stated interests outweigh the benefits.

E. The Plain Language of the Statute Contains a Gatekeeping Role for Courts

Requiring courts to review requests from attorneys hired by third parties serves an important function to ensure fairness in the litigation and to ensure that the above considerations are weighed. The statute, which

requires courts to exercise a gatekeeping role, allows courts to consider whether the appointment of counsel will cause harm to the child or increase the risk of error. *See* RCW 13.34.100(7).

The Court of Appeals correctly recognized that the plain language of the statute contains a gatekeeping role for the dependency court to assess requests from third parties who wish to hire an attorney for a dependent child. *Matter of Dependency of E.M.*, 12 Wn. App. 2d 510, 519, 458 P.3d 810, 815, *review granted*, 196 Wn.2d 1009, 473 P.3d 256 (2020). Pursuant to the statute, almost anyone can retain an attorney for the purpose of asking for the court to appoint counsel. RCW 13.34.100(7)(b)(B).[11] But there is no provision that allows attorneys to bypass that requirement, and appear on behalf of a young child, without first seeking the Court's permission.

By giving the dependency court this gatekeeping function, the statute allows the court to consider the impact of the appointment of counsel on both the child and on the litigation. Courts have a role in determining whether the appointment of counsel could be harmful to the child. *See e.g. In re Dependency of MSR*, 174 Wn.2d at 7. And, as part of this inquiry

[11] The court rules, including JuCR 9.2, must be read together with RCW 13.34.100(7), which states that all appointments of counsel to dependent youth require a court appointment.

courts should also consider whether the child's inability to direct their attorney increases the risk of error in the case.

The Court has already recognized that, "[i]f a child's stated interests are indeterminable due to infancy …then the increased decisional accuracy of an attorney will likely be low." *Matter of Dependency of E.H.*, 191 Wn.2d at 893. But the concern goes further: as argued above, there are situations in which the appointment of counsel to a young child can decrease the decisional accuracy of the court because the attorney, rather than the impacted child, is setting the goals of the litigation. An attorney for a child has a great deal of influence in a dependency case. As one scholar has noted:

> When an attorney represents very young or school-age children whose youth and social development limit their ability to comprehend the issues at stake, the attorney has a great deal of power to make strategy and even goal decisions. In this context, the hallmarks of the attorney-client relationship--confidentiality and loyalty--create a private, inaccessible space between the attorney and child. This space shields from view what happens within the relationship and provides the attorney with a mandate to project the child's interests. Although there are positive aspects to this unity between attorney and client, the privacy of this relationship may shield the attorney from accountability to a relatively powerless child and to others in the child's life, including the judge.

Appell, at 599. Unlike GALs, who are bound by a statutory requirement to inform the court of the expressed wishes of child, RCW 13.34.105(1)(b), attorney-client communications are protected and an attorney can be

expected to refuse to disclose their conversations with their clients, or indeed, whether they had *any* communication with a client.

F. Parents Must Have an Opportunity to Be Heard When Someone Else Hires an Attorney to Represent Their Child in a Case in Which Their Right to Family Integrity is at Stake

In addition to children, parents also have the fundamental right to family integrity at stake in dependency cases. *Matter of Welfare of D.E.*, 196 Wn.2d 92, 103, 469 P.3d 1163, 1169 (2020) (holding "the preservation of families is a paramount interest shared by the parents, the child, and ultimately, the Department."). According to the petitioner's view in this case, practically anyone can hire an attorney for a dependent child, and that attorney can determine the goals of the litigation, but the parents would not have an opportunity to be heard at all prior to the attorney taking a position on behalf of their child.

Parents' authority over their children is limited by the very existence of a dependency case. However, ordinarily, parents can direct litigation on behalf of their young children in court. *See Kirkpatrick v. Cty. of Washoe*, 792 F.3d 1184, 1190 (2015), *on reh'g en banc*, 843 F.3d 784 (9th Cir. 2016) (describing the premise that a parent is authorized to assert causes of action belonging to his minor child on behalf of the child.) And even in dependency cases parents retain some autonomy to make decisions regarding their children. *E.g.* RCW 13.34.130(1)(a) (requiring services that

"least interfere with family autonomy"). Accordingly, it would be troubling to allow people who are not parties, for example foster caregivers, to hire counsel for children, and then allow the lawyer to determine the goals of the representation, without even giving a parent the chance to be heard.

G. There Is Nothing Inherently Problematic About Third Party Fee Arrangements; But the Court Must Closely Scrutinize Such Arrangements When the Client Is Not Informed and Has Not Consented to the Representation

Finally, third party fee agreements are common and do not raise ethical concerns when, as the rule requires, the client consents to the representation. RPC 1.8(f). Indeed, "because third-party payers frequently have interests that differ from those of the client," lawyers are prohibited from accepting such representations without informed consent from the client. *See* RPC 1.8, Comment 11. In this case, E.M., who was three at the time, was not informed of the representation, did not consent to having an attorney, and did not direct the goals of the litigation. This convergence of factors created conditions in which the lawyer was empowered to make critical decisions about the direction of the litigation on behalf of the child without any direction from the client.

VI. CONCLUSION

Accordingly, the dependency statute, which requires courts to assess requests to appear as counsel for very young children in dependency cases, serves an important gatekeeping function and must be upheld.

DATED this 16th day of December 2020.

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KING COUNTY DEPARTMENT OF PUBLIC DEFENSE

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